m/021/004

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Cedar City Field Office
176 East DL Sargent Drive
Cedar City, Utah 84720

RECEIVED
JUN - 7 1999
DIV. OF OIL, GAS & MINING

In Reply Refer To:
UT-040
3809: UTU-67116

June 4, 1999

Mr. David Suhr
Reclamation Engineer
Hecla Mining Company
6500 Mineral Drive
Coeur d'Alene, Idaho 83814-8788

Dear Mr. Wilson:

This letter is in regards to the mill tailings impoundment associated with the Escalante Silver Mine, Division of Oil, Gas, and Mining (DOGM) File No. M/021/004, Iron County, Utah. The mill tailings impoundment area is located entirely on BLM land managed through this office. You had contacted me last month requesting that this office inspect the tailings area and report our findings on the reclamation status to yourself and the State of Utah.

I and Mr. Warr, a staff Range Conservationist at this office, inspected the site on May 27, 1999. A report detailing our findings is attached. As a follow up to the inspection, on May, 28, 1999, I spoke with Mr. Lynn Kunzler, Senior Reclamation Specialist for DOGM, who is presently overseeing the reclamation of this site. We discussed the current anticipated release date for the impoundment site and concluded that it would be appropriate and reasonable to postpone bond release for the remaining monies associated with the impoundment area for one more year.

The inspection identified two problems that will need to be corrected immediately. These are:

1. Diffuse Knapweed, a noxious weed, has established itself in a small area on the bottom and slopes of the tailings dam, and is beginning to spread onto the upper surface of the reclaimed impoundment area. This outbreak area will need to sprayed throughly sometime in the next month to prevent the weed from spreading further on the site.

2. A section of the 8' high exclusion fence, located on the northeast section of the impoundment area, has been seriously bent by wind loading due to trapping of wind-borne tumbleweeds. This area will need to be repaired and strengthened to prevent any breaching of the fence line and entry of livestock or large wildlife. It is also suggested that the entire fence perimeter be inspected and buttressed and/or strengthened as needed, since final release of the site will require that the fence line be in good condition.

BLM is also of the opinion that it would prudent to leave the 8' high fence in place rather than have it replaced by a 6' fence, as is the current plan. The importance of maintaining the vegetative cover on the site clearly outweighs any benefits to be gained to large wildlife in the area for forage.

If you have any questions feel free to call me at (801) 865-3040.

Sincerely,

Ed Ginouves
Mining Engineer

Attachments: Copy of inspection report
xc: Lynn Kunzler, DOGM - with copy of inspection report

BLM Cedar City Field Office
Site Inspection Report

May 27, 1999

To: Case file UTU-67116, 43 CFR 3809 Disturbance

From: Ed Ginouves, BRRA Mining Engineer

Subject: Site Inspection

On May 27, 1999, I and Gus Warr, Range Conservationist, visited the subject plan-level disturbance, which consists of a decommissioned silver mine and mill, located on private and State lands, and a large mill tailings area located on adjacent Federal lands. Reference the inspection report dated June 26, 1997 for background information and photos of the site. The purpose of this visit was to check on the vegetation covering the reclaimed tailings pond. I chose Mr. Warr to accompany me as the tailings facility was in his area of grazing allotments and he was familiar with the desirable species of the area.

I have visited the site for the past two years to document changes/improvements in the vegetative cover on the tailings cap. While a stable vegetative cover seems to be established, I am not qualified to assess the desirability of the species established and whether the site can be considered ready for bond release.

Mr. Warr and myself walked the entire east-west extent of the site. In doing so it was apparent that the principal species present are rubber rabbit brush and cheatgrass, two invader species that normally quickly establish themselves on disturbed areas until they are displaced by more "desirable" species. Smaller amounts of a number of other species were found. It was also apparent that the density of vegetation (both "desirable" and "less-than-desirable") is much greater on the western one-third of the pile. Species noted as being present are given in the attached report.

We discussed the possible benefits and problems of any additional re-vegetation measures on the tailings cap. Mr. Warr was of the opinion that the existing vegetative mix would over time continue to improve by the more desirable species slowly displacing the cheatgrass and rabbit brush. This succession of species would be slow in coming and efforts to accelerate this (through re-seeding, addition of soil amendments, fertilization, might well be outweighed by damage to the progress that has been made to date. Given the small amount of possible wildlife forage/habitat on the site, and the importance of maintaining the integrity of the cap through vegetative cover, it was decided that it would appropriate to leave the current 8' high fence in place as the final fence.

A 200' section (located on the northeast side of the perimeter) of the 8' high site fence has been bent to a 45° degree angle and will need to be repaired. The damage is probably being caused by tumbleweed blowing against this section.

A small patch of what appeared to be a type of knapweed (a noxious weed), has established itself at the base of the tailings dam just south of the gated entry, and is beginning to spread up the dam slope to the top of the pile.

The following remedial efforts, at a minimum, were decided upon:

1. Spray the existing area of knapweed immediately before it spreads any further on the pile.

2. Repair the site fence and buttress/reinforce areas that have weakened.

HECLA mine inspection

5-27-99

- Noxious weed found was:

  Diffuse Knapweed (see attachment)

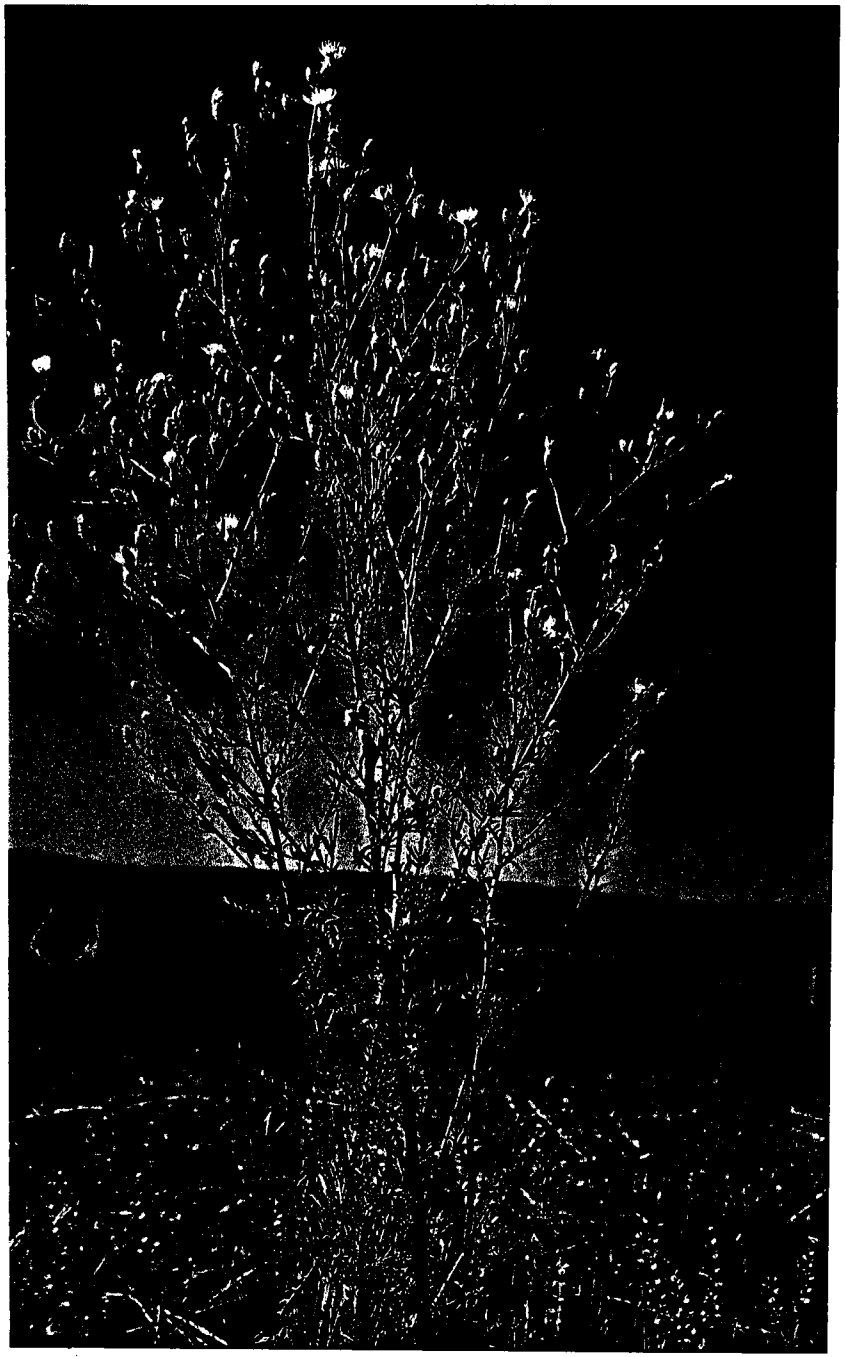
- Plant species found on the site:

	Type
- Rubber rabbitbrush	shrub
- Storksbill or filaree (Erodium)	forb
- Annual mustard weed	forb
- Cheatgrass	grass
* Crested wheatgrass	grass
* Russian wildrye	grass
- Globemallow (Sphaeralcea)	forb
- Indian Rice grass	grass
- wyoming big sagebrush	shrub
- unidentified annual forb	forb

The majority of the site is covered with cheatgrass and rubber rabbit brush. Crested wheat grass is sparsely covering the entire area. The lower 1/3 of the site has good cover of Russian wildrye, crested wheat, and brush. Most of the area has annual filaree or storksbill (often very dense) spread across it. The knapweed is isolated to a small area on the North side of the site.

R.M.S.

ıse knapweed
urea diffusa (Lam.)



Asteraceae
(Sunflower family)

This weed is a diffusely branched annual or short-lived perennial, 1 to 2 feet tall, stems are rough to the touch. Leaves are small, pinnately divided; lower leaves are deciduous, the reduced leaves of the inflorescence are mostly entire. Flowering heads are numerous and narrow. Ray flowers are white to rose or sometimes purplish; margins of involucral bracts are divided like the teeth of a comb, and bracts are tipped with a definite slender spine. Achenes are brown or grayish; pappus is lacking.

Centaurea is a large genus of over 400 species, most originating in the Mediterranean region. All of the species treated here have been introduced from Eurasia within the last 100 years and now represent a threat to pastures and rangelands. Diffuse knapweed infests roadsides, waste areas and dry rangelands, and as a highly competitive plant, threatens to exclude many desirable forage species. Flowering occurs from July to September.

Seedlings of diffuse knapweed have finely divided leaves covered with short hair. Herbicides are most effective when applied at this early growth stage.

Bracts under the flower have yellow spines with teeth appearing as a comb along the spine margins.